

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

INGE GOODSON,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 1:12-cv-00065

PRETRIAL DISCLOSURES

Defendant Bank of America, N.A. ("BANA") by and through its undersigned counsel, submits the following pre-trial disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure.

1. Witnesses. The names and addresses of witnesses whose testimony BANA will or may present are set forth below. BANA reserves the right to call any witnesses identified by the Plaintiff Inge Goodson ("Plaintiff") and to call witnesses not previously listed or identified for rebuttal or impeachment without prior disclosure.

- (a) Bank of America, N.A. Corporate Representative
- (b) Plaintiff

2. Witnesses Whose Testimony is Expected to Be Presented by Deposition.

None.

3. Exhibits. BANA reserves the right to utilize any exhibits listed by Plaintiff and further reserves the right to use, introduce, or rely upon any other discovery materials, including but not limited to deposition transcripts, for impeachment or rebuttal or on cross-examination, or in the event a witness who was deposed or subpoenaed for trial, fails to appear. In addition, BANA expects to use the following exhibits at trial:

- (a) Plaintiff's payment history.

- (b) Any loan document produced through discovery or in response to the third party subpoena to BANA in the case *Goodson v. Shapiro & Kirsch*.
- (c) Discovery responses of Plaintiff including any production.
- (d) The letter from BAC Home Loans Servicing, LP to Plaintiff dated August 23, 2009. (Subject to exclusion as the result of an order on BANA's affirmative defenses.)
- (e) The letter from Shapiro & Kirsch, LLP to Plaintiff dated May 6, 2010. (Subject to exclusion as the result of an order on BANA's affirmative defenses.)
- (f) The letter from BAC Home Loans Servicing, LP to Plaintiff regarding the servicing transfer that Plaintiff received on July 8, 2011 ("July 8 Letter").
- (g) The letter dated July 13, 2011, informing Plaintiff that the July 8 Letter was sent in error.
- (h) The letter from Blank Rome, LLP dated October 7, 2011.
- (i) Any pleading, motion, or order filed.
- (j) The exhibits to any pleading, motion, or order filed.
- (k) Any exhibits identified by Plaintiffs.
- (l) Any exhibit needed for rebuttal.

BANA reserves the right to supplement or amend this list.

This 21st day of June, 2013.

Submitted by:

/s/ Paul Allen England

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2013, the foregoing *26(a)(3) Pretrial Disclosures* was served by e-mail transmission upon the parties listed below.

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